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Of Attorneys for Defendants

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
EUGENE DIVISION

GABRIEL PARRA,

Plaintiff,

vs.

EUGENE WATER & ELECTRIC BOARD,
a municipal utility; JEREMIAH HUNT;
TOM BUCKHOUSE; and ROGER GRAY,

Defendants.

Case No. 6:13-cv-00365-MC

**DEFENDANTS' OFFER OF
JUDGMENT**

Pursuant to Fed. R. Civ. P. 68

Pursuant to Fed.R.Civ.P. 68, defendants offer to allow entry of judgment on the following terms:

1. In favor of plaintiff and against defendant Eugene Water & Electric Board ("EWEB") in the amount of \$35,000 (Thirty-Five Thousand and no/100 Dollars), which sum shall include all costs and attorney fees otherwise recoverable in this action;
2. Dismissing all claims against defendants Hunt and Buckhouse with prejudice and

without attorney fees or costs awarded to defendants Hunt and Buckhouse; and

3. Dismissing the claims against defendant Gray, which have previously been dismissed without prejudice, with prejudice and without attorney fees or costs awarded to defendant Gray.

Defendants intend that this offer of judgment be allocated as follows: (1) \$5,000 (Five Thousand and 00/100 Dollars) for plaintiff's claims for economic damages for back and front pay and benefits; (2) \$15,000 (Fifteen Thousand and 00/100 Dollars) for plaintiff's claims for non-economic damages; and (3) \$15,000 (Fifteen Thousand and 00/100) for plaintiff's claims for attorney fees and costs. If plaintiff accepts this offer of judgment, the payment of \$5,000 (Five Thousand and 00/100 Dollars) for plaintiff's claims for economic damages for back and front pay and benefits shall be paid via a payroll check and shall be subject to payroll deductions required by law.

Nothing in this offer of judgment shall be construed as an admission of liability.

DATED this 12 day of July, 2013.

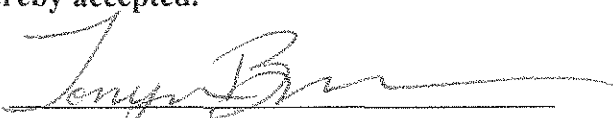
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Defendants' Offer of Judgment is hereby accepted.

Dated: July 29, 2013.


Kevin T Lafky, OSB No. #852633
Tonyia J Brady, OSB No. #103491
Lafky & Lafky
Of Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I certify that on July 12, 2013, I served or caused to be served a true and complete copy of the foregoing **DEFENDANTS' OFFER OF JUDGMENT** on the party or parties listed below as follows:

- ☐ Via CM / ECF Filing
- ☒ Via First Class Mail, Postage Prepaid
- ☒ Via Email
- ☐ Via Personal Delivery

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CERTIFICATE OF SERVICE